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Attorney for Plaintiff TACHARA HUGHES

5 UNITED STATES DISTRICT COURT
6 DISTRICT OF NEVADA
7 ***

8 TACHARA HUGHES,

9 Plaintiff,

10 vs.

11 SOUTHERN HILLS MEDICAL CENTER,
LLC., a Nevada Limited Liability Company;
12 Does I-X; Roe Corporations I-X,
13 Defendants.

Case No.: 2:16-cv-01997-JAD-PAL

**STIPULATION TO EXTEND TIME TO
FILE JOINT PRE-TRIAL ORDER**

[SECOND REQUEST]

ECF No. 48

16 Plaintiff, TACHARA HUGHES, and Defendant, SOUTHERN HILLS MEDICAL CENTER,
17 LLC, by and through their respective counsel of record, hereby stipulate and agree to extend the
18 current deadline to file a Joint Pretrial Order of June 11, 2018, (*see* ECF No. 45), up to and including
19 **June 25, 2018**, which is 14 days.

20 Good cause exists for the requested extension. The parties attended a settlement conference
21 on May 9, 2018; however, settlement discussions continued beyond that date until May 25, 2018
22 when an impasse was completely reached. The parties have now turned their attention to the Joint
23 Pre-Trial Order. Plaintiff's counsel has had a very busy schedule since May 25 including
24 administrative hearings, an all-day mediation on May 31, and multiple depositions including one in
25 Reno on June 4, and Fort Worth, Texas on June 5 with the associated travel. Further, Plaintiff's
26 counsel has an outstanding family obligation that is requiring him to travel to New York and he will
27 not return to the office until June 11, which is the due date for the Joint Pre-Trial Order. Counsel
28 will need time to meet and confer on the contents of the Joint Pre-Trial Order and that will not be

1 possible until after the June 11, 2018 due date.

2 For the foregoing reasons the parties request an extension of 14 days to June 25, 2018 to file
3 the Joint Pre-Trial Order with the court.

4 This is the second request for an extension of this deadline and it is sought in good faith and
5 not for the purpose of delay.

6
7 Dated: June 7, 2018

Dated: June 7, 2018

8 Respectfully submitted,


Respectfully submitted,

9
10 /s/ James P. Kemp
11 JAMES P. KEMP, ESQ.
12 KEMP & KEMP, ATTORNEYS AT LAW
Attorney for Plaintiff

/s/ Bruce C. Young
BRUCE C. YOUNG, ESQ.
LEWIS BRISBOIS BISGAARD & SMITH, LLP
Attorney for Defendant

13
14 **ORDER**

15 IT IS SO ORDERED. However, the parties are cautioned that work load of counsel will not
16 constitute good cause for further extension of this deadline.

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18 
19 U.S. District Judge Jennifer A. Dorsey
June 8, 2018